December 21, 2001

IN THE MATTER OF SUPPLEMENTAL COMMENT SOUGHT ON NATIONAL CABLE TELEVISION ASSOCIATION AND THE MEDIA ACCESS PROJECT EX PARTE PRESENTATIONS REGARDING EAS DECODERS.
EB DOCKET NO 01-66

Comments on behalf of the Sage Alerting Systems ENDEC.
Submitted by Harold Price, ENDEC Project Manager
5949 Pudding Stone Lane
Bethel Park, PA 15102

The Sage Alerting Systems ENDEC was the first Part 11 certified EAS encoder/decoder. It is installed at a majority of broadcast outlets, as well as at various emergency operations centers nationwide. I am the ENDEC project manager, and am responsible for the design and implementation, as well as ongoing EAS work.

MAC filing

The FCC in the comments for the first LPFM report and order implied that non-certified decoders were available for less than $1000 (giving an example of a $650 decoder), and it was therefore likely that a certified decoder would be available for that price.

There are several additional Part 11 requirements for decoder certification that are unlikely to be included in a consumer or fire station based product.

1) Two audio inputs and one (serial) data input. Consumer decoders have a single audio input. An EAN on one input must override the others, requiring two inputs rather than statistical sampling of two audio inputs with a single decoder.
2) Storing 10 preselected header codes
3) Storing the last 10 valid messages
4) Display of originator, event, Originator, Event, Location, the valid time period of the message and the local time the message was transmitted, on a display readable in light or dark.
5) Lock or password to protect programming of preselected headers
6) Detection of duplicates
7) EBS two-tone detect

The market represented by LPFM stations is too small to warrant significant investment by existing or new EAS vendors of certified equipment.

The FCC would need to establish a new decoder definition for LPFM stations to allow the use of consumer grade equipment, including:

1) A single audio input
2) No storage of previous messages
3) Reduced display requirements
4) No requirement for program locking

5) No Detection of EBS two-tone

NCTA/NAD filing

LPFM stations have no requirement to put the alert on the air, only to alert station personnel. In contrast, the NCTA/NAD wants to place the audio alert and video information on the system using a decode only unit.. Cable EAS systems are a combination of EAS encoder/decoders and specialized cable equipment, usually sold as a bundled or integrated whole. Reducing the role played by the EAS unit may only increase the role played by other components of the system, resulting in a likely increase in cost rather than the decrease sought.

By definition, a decoder does not place information on the air. It serves as an in-studio warning device only. Once information is to be automatically placed on the air, additional requirements come into play, in particular the removal of duplicates from the two monitor sources, the generation of the text, the two minute timer, provisions for getting the headers sent, etc.

If the NCTA/NAD wants to place the alert on the air, they need the encoder function.

Conclusions

If small cable and LPFM stations are required to participate in EAS, they need to meet all of the requirements of EAS. The FCC should not attempt to water down the EAS requirements into a parallel "EAS Lite" specification. Further, stations who wish to automatically put an alert on the air need the services of an Encoder, even if they aren't going to "originate" any alerts.

Market economics make it unlikely that a low cost Part 11certifiable decoder-only unit for the LPFM market will be available.